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14 Attorneys for The Roman Catholic Archbishop of
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15 UNITED STATES BANKRUPTCY COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17 In re

18 THE ROMAN CATHOLIC ARCHBISHOP
19 OF SAN FRANCISCO,,

20 Debtors.

Case No. 23-30564

Chapter 11

**SUPPLEMENTAL DECLARATION OF
PAUL E. GASPARI IN SUPPORT OF
FIRST INTERIM FEE APPLICATION OF
WEINTRAUB TOBIN CHEDIAK
COLEMAN GRODIN LAW
CORPORATION FOR ALLOWANCE OF
FEES AND REIMBURSEMENT OF
EXPENSES AS SPECIAL LITIGATION
COUNSEL FOR THE DEBTOR IN
POSSESSION**

25 Date: April 18, 2024
26 Time: 9:30 a.m.
Place: Via ZoomGov

27 Judge: Hon. Dennis Montali
28

1 I, Paul Gaspari, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of California and a
3 shareholder with Weintraub Tobin Chediak Coleman & Grodin Law Corporation (“Weintraub” or
4 the “Applicant”), special corporate and litigation attorneys for The Roman Catholic Archbishop of
5 San Francisco, a California corporation sole, the debtor and debtor in possession in the above-
6 captioned chapter 11 case (“RCASF” or the “Debtor”).

7 2. The matters stated herein are true and correct and are within my personal
8 knowledge or information provided to me by other attorneys or employees of Weintraub Tobin,
9 and if called upon to testify as a witness, I could and would testify competently thereto.

10 3. This supplemental declaration is made in support of the *First Interim Fee*
11 *Application of Weintraub Tobin Chediak Coleman Grodin Law Corporation for Allowance of*
12 *Fees and Reimbursement of Expenses as Special Litigation Counsel for the Debtor in Possession*
13 (the “Application”). I give capitalized terms not defined here the same meaning given to them in
14 the Application.

15 4. The Application did not include the following information in compliance with the
16 UST Guidelines: (a) information to be provided about customary and comparable compensation;
17 and (b) information about budget and staffing plans.

18 5. Attached to this declaration as Exhibit 1 is a summary of customary and
19 comparable compensation provided by Weintraub describing the blended hourly rates of the
20 various categories of timekeepers that provided services to the Debtor during the Application
21 Period. I give defined terms used in this exhibit the same meanings ascribed to them in ¶ C.3 of
22 the UST Guidelines.

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6. Attached to this declaration as Exhibit 2 is a copy of the “Attorney Fee Budget” agreed upon by and between the Debtor and Weintraub. This exhibit also includes a comparison of budgeted to actual fees sought during the Application Period. Weintraub is not submitting a detailed staffing plan or summary of fees and hours budgeted compared to fees and hours billed for each project category as this information is privileged and confidential.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 17th day of April, 2024, at San Francisco, California.

DocuSigned by:
Paul E. Gaspari
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Exhibit 1

Summary of Customary and Comparable Compensation (UST Guidelines, Ex. A)

Category of timekeeper (using categories already maintained by the firm)	Blended hourly rate	
	U.S. Non-Bankruptcy Blended Rate	Bankruptcy Estate Blended Rate
Sr./Equity Partner/Shareholder	\$569.08	\$482.19
Jr./Non-Equity/Income Partner	\$534.39	\$454.94
Sr. Associate (7 or more years since first admission)	\$350.03	\$392.23
Associate (4–6 years since first admission)	\$319.30	\$365.23
Contract Attorney	\$318.95	\$250.00
Paralegal	\$221.81	\$216.11
All timekeepers aggregated	\$415.15	\$360.11

Exhibit 2

Weintraub Fee Budget

Month	Aug. 2023	Sept. 2023	Oct. 2023	Nov. 2023
Fees & Expenses	\$20,000	\$50,000	\$50,000	\$50,000
Month	Dec. 2023	Jan. 2024	Total for Application Period	
Fees & Expenses	\$50,000	\$60,000	\$280,000	

Comparison of Budgeted to Actual Fees Sought During Application Period

Fees and Expenses Budgeted	Fees and Expenses Sought	Difference Between Budgeted and Actual Fees and Expenses Sought
\$280,000	\$80,003.44	\$199,996.56